

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

NATIONWIDE MUTUAL INSURANCE CO.,	:	CIVIL ACTION
	:	
Plaintiff	:	
	:	
vs.	:	
	:	
MAUREEN REPETTO DAILY, as Parent and	:	NO. 02-CV-4830
Natural Guardian of William Repetto, a Minor	:	
and	:	
MICHAEL DAILY	:	Electronically Filed
	:	
Defendants	:	

**DEFENDANT, MAUREEN REPETTO DAILY'S ANSWER TO PLAINTIFF
NATIONWIDE'S MOTION FOR A PROTECTIVE ORDER AND DEFENDANT'S
COUNTER-MOTION TO COMPEL DISCOVERY, FOR SANCTIONS PURSUANT TO
F. R. CIV. P. 37, AND TO EXTEND TIME FOR DISCOVERY**

Defendant Maureen Repetto Daily hereby answers Plaintiff Nationwide's Motion for a Protective Order and counter-moves: (1) to compel discovery and for the imposition of sanctions pursuant to F. R. Civ. P. 37, and (2) to extend time for discovery. In support thereof, Defendant, Maureen Repetto Daily, avers the following:

Defendant Maureen Repetto Daily hereby joins in Defendant Michael Daily's Answer to Plaintiff Nationwide's Motion for Protective Order and Counter-Motion to Compel Discovery.

WHEREFORE, Defendant Maureen Repetto Daily respectfully requests that: (1) Plaintiff's Motion for Protective Order be DENIED; (2) Plaintiff be required to produce the witnesses requested pursuant to the Notices of Deposition with all requested documentation within ten days of the date of the Court's Order; (3) Plaintiff pay sanctions in the amount of \$1740.00 to Defendant

Michael Daily and sanctions in the amount of \$500.00 to Defendant Maureen Repetto Daily; and
(4) the discovery deadline be extended until May 23, 2003.

Respectfully submitted,

VILLARI, OSTROFF, KUSTURISS,
BRANDES & KLINE, P.C.

By: /s/ John E. Kusturiss, Jr.

John E. Kusturiss, Jr., Esquire #28271

Attorneys for Defendant,

Maureen Repetto Daily

8 Tower Bridge, 4th Floor

161 Washington Street

Conshohocken, PA 19428

Ph: 610/729-2900; Fax 610/729-2910

jkusturiss@voklaw.com

Dated: 4/18/03

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Plaintiff	:	
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MAUREEN REPETTO DAILY, as Parent and	:	NO. 02-CV-4830
Natural Guardian of William Repetto, a Minor	:	
and	:	
MICHAEL DAILY	:	
	:	
Defendants	:	

CERTIFICATE OF SERVICE

I, John E. Kusturiss, Jr., Esquire, attorney for Maureen Repetto Daily, do hereby state that a true and correct copy of Defendant, Maureen Repetto Daily's Answer to Motion for Protective Order, Defendant's Counter-Motion to Compel Discovery and Extend Time for Discovery was served upon counsel of record by first-class mail, postage prepaid on the 18th day of April, 2003, as follows:

Philip A. Ryan, Esquire
German, Gallagher & Murtagh
200 South Broad Street, Suite 500
Philadelphia, PA 19102

David Jaskowiak, Esquire
222 S. Easton Road, Suite 104
Glenside, PA 19038

VILLARI, OSTROFF, KUSTURISS,
BRANDES & KLINE, P.C.

By: /s/ John E. Kusturiss, Jr.
John E. Kusturiss, Jr., Esquire #28271
Attorneys for Defendant,
Maureen Repetto Daily
8 Tower Bridge, 4th Floor
161 Washington Street
Conshohocken, PA 19428
Ph: 610/729-2900; Fax 610/729-2910
jkusturiss@voklaw.com